REMARKS

Reconsideration of the application is respectfully requested.

The Office Action rejected claims 1-30 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 6,477,702 to Saxe et al. ("Saxe") in view of U.S. Patent Publication No. 2004/0255273A1 to Chan ("Chan"). While conceding that Saxe does not disclose or suggest "b) automatically applying a set of rules to said program flow analysis graphs, including at least performing a reachability analysis for at least removing one or more edges to reduce reachability", the Office Action alleges that Chan supplies that element. Applicant respectfully disagrees.

Chan as understood by applicant discloses reformulating resources with nodes reachable from defined entry points. Chan appears to disclose regrouping resources so that a highest order application has the services it may require available in one resource, the next high order application has the services available in two resources, etc. (see pages 2-3 of Chan). The cited passages of Chan (FIG. 4, blocks 404, 408, and page 4, [0057]) explain this regrouping scheme. That section explains that the services reachable from the highest order application are regrouped to be contained in a single resource and the edges are redirected to that single resource.

Chan, however, does not disclose or suggest, "automatically applying a set of rules to said program flow analysis graphs, including at least performing a reachability analysis for at least removing one or more edges to reduce reachability" claimed in independent claims 1, 20 and 30. That is, while Chan regroups the its resources and redirects the edges, Chan does not disclose or suggest, "performing a reachability analysis for at least removing one or more edges to reduce reachability", let alone "by automatically applying a set of rules to said program flow analysis graphs". Rather, Chan maintains its reachability to a node albeit to a different resource group.

Further, combining Saxe and Chan as the Office Action does is improper. Sax as understood by applicant discloses a system and method for increasing the speed of operation of a theorem prover relating to program verification using adaptive pattern matching technique. Chan as understood by applicant discloses regrouping resources such as dynamic linked libraries such that an application classified as being in high order can access a single library for all its resources, an application classified as being in the next high order can access two libraries for all its resources, etc. It is applicant's belief that there would be no motivation to combine the teachings related to operation of a theorem prover with teachings related to reformulating library resources. Therefore, combining Saxe with Chan to reject the claims in the present application is improper and, thus the claims in the present application are not unpatentable over Saxe and Chan.

For at least the same foregoing reasons, independent claims by virtue of dependency are also believed to be nonobvious.

In view of the foregoing, applicant respectfully requests reconsideration, withdrawal of all rejections, and allowance of all pending claims. If the Examiner believes a telephone conference might expedite prosecution of this case, it is respectfully requested that he call applicant's attorney at (516) 742-4343.

Respectfully submitted,

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